

AO 187 (Rev. 7/87) Exhibit and Witness List

# United States District Court

## District of Hawaii

RAYMOND WARE

V. MICHAEL CHERTOFF;  
ET AL

EXHIBIT AND WITNESS LIST

CASE NUMBER: 04-00671 HG/LEK

PRESIDING JUDGE Helen Gillmor					PLAINTIFF'S ATTORNEY Daphne E. Barbee	DEFENDANT'S ATTORNEY Tom Helper, Asst. US Attorney
TRIAL DATE(S) February 5, 2008					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES	
1					Resume	
2		3-13-08			EEO Complaint of 7-11-03	
3		3-13-08			EEO Letter from Farha Rahman	
4		3-13-08			Counseling Report from Farha Rahman	
5		3-14-08		3-14-08	6-13-03 Letter from Sidney Hayakawa	
6					EEO Complaint of 8-9-03	
7		3-12-08		3-14-08	Letter to Sidney Hayakawa, 9-8-03	
8					Ware Affidavit and Addendum, 3-30-04	
9					Ware Declaration, 5-20-04	
10		3-14-08		3-14-08	Ken Kamahele Memo Re: Promotions and Hirings	
11					Screening Manager Vacancy Announcement, 8-1-03	
12					Certificate of Candidates for Screening Manager Position, 8-29-03	
13					Ware's Application for Screening Manager	
14					Overview of 2 Year Record of Screening Managers	
15		3-12-08		3-12-08	General Counseling, 9-10-03	
16		3-13-08		3-13-08	Performance Agreement, 10-25-03	
17					EEO Complaint of 11-26-03	
18					Deposition of Ken Kamahele	
19					Deposition of Milagros Drake	
20					Pay Statement for Mr. Ware	
21		3-12-08		3-12-08	Letter from Ware to Kamahele, 10-3-03	
22					Declaration of Allen Wiley	

include a notation as to the location of any exhibit not held with the case file or not available because of size.

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## EXHIBIT AND WITNESS LIST - CONTINUATION

RAYMOND WARE

MICHAEL CHERTOFF;  
V. ET AL

CASE NUMBER: 04-00671 HG/LEK

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
23					Declaration of Ken Kamahele
24					Honolulu Management Inquiry Team Notes
25					Employee "A" Resume (Screening Manager)
26		3-14-08		3-14-08	Memo to Ware from Hayakawa, 9-12-03
27		3-12-08		3-10-08	Letter to Hayakawa from Ware, 9-16-03
28					Letter to Hayakawa from Ware, 9-8-03
29					Interoffice Memo to Ventura, 9-11-03
30					Letter to Johnalyn Abreu from Raymond Ware, 10-2-03
31		3-13-08			Incident Report from Raymond Ware, 6-12-03
32					Incident Report from Raymond Ware, 3-26-03
33		3-12-08		3-12-08	HR Policy on Promotions
34					Time-line Chart
35					2003 News Article, Re: Screening Promotion Problems
36		3-12-08		3-12-08	Interoffice Memos, February 23 to March 8
37					Letter Re: Mobile Screening Force, 8-30-02
38					Letter Re: Salary Reconsideration for Mobile Screeners, 10-3-02
39					Email Re: Mobile Screener Advancement, 4-22-03
40					Email Re: Mobile Screeners Group, 4-22-03
41		3-13-08		3-13-08	Memo Re: Certification of Training for Raymond Ware, 6-14-02
42					Director's Message Memo, 12-13-02
43					Schedule for Screeners and Screening Supervisors
44					Interoffice Memo Re: SOP, 3-23-03
45					Diversity Management Objectives for TSA
46		3-12-08		3-12-08	TSA Prohibited Items List, 7-3-02
47		3-13-08			Letter to Kamahele from Dennis Clark, 7-26-06
48		3-13-08			Gun replica